

3.0 Access Controls

The effectiveness of RFLMA required physical controls (signs and other features that protect engineered elements of the remedy) that work as access controls at the Site will be monitored regularly. Other access controls used at the Site include locks, chains, manholes, vaults, and fencing. DOE will document inspections of the physical controls and any evidence of failure of institutional controls in the RFLMA annual reports (see Section 15.0). During the inspections, DOE will note any repairs and maintenance needed for physical controls and will perform the repairs and maintenance promptly. If DOE finds evidence of activities that violate land-use restrictions (see Section 3.1), DOE will immediately commence repairs or other corrective action in consultation with EPA and CDPHE.

3.1 Institutional Controls

Institutional controls for the COU include land-use restrictions that are established in the CAD/ROD (Attachment A1), embodied in the Environmental Covenant (Attachment A3), and implemented through RFLMA (Attachment A2). The institutional controls are summarized in Table 4 of Attachment 2 to RFLMA and are included below for convenience (Table 3–1). The objectives and rationale for each institutional control is included in Appendix F.

Table 3–1. Institutional Controls for the COU

Controls	Use Restrictions
1	The construction and use of buildings that will be occupied on a permanent or temporary basis (such as for residences or offices) is prohibited. The construction and use of storage sheds or other, non-occupied structures is permitted, consistent with the restrictions contained in controls 2 and 3 below, and provided such use does not impair any aspect of the response action at Rocky Flats.
2	Excavation, drilling, and other intrusive activities below a depth of 3 feet are prohibited, except for remedy-related purposes and routine or emergency maintenance of existing utility easements, in accordance with pre-approved procedures.
3	No grading, excavation, digging, tilling, or other disturbance of any kind of surface soils is permitted, except in accordance with an erosion control plan (including Surface Water Protection Plans submitted to EPA under the Clean Water Act) approved by CDPHE or EPA. Any such soil disturbance will restore the soil surface to preexisting grade.
4	Surface water may not be used for drinking water or agricultural purposes.
5	The construction or operation of groundwater wells is prohibited, except for remedy-related purposes.
6	Digging, drilling, tilling, grading, excavation, construction of any sort (including construction of any structures, paths, trails, or roads), and vehicular traffic are prohibited on the covers of the Present Landfill and the Original Landfill, except for authorized response actions.
7	Activities that may damage or impair the proper functioning of any engineered component of the response action, including but not limited to any treatment system, monitoring well, landfill cap, or surveyed benchmark, are prohibited.

Signs are posted at each gate to the COU listing the land-use restrictions. In accordance with Section 5.3.6 of Attachment 2 to RFLMA, the COU must be inspected at least annually for evidence of violation of institutional controls; however, all personnel are expected to be observant during their daily activities and immediately report any evidence of violation of institutional controls to the DOE-LM Site manager.

Section 5.3.6 of Attachment 2 to RFLMA also requires that an annual check be performed to ensure that the Environmental Covenant remains on file with Jefferson County and that no

unauthorized changes have been made to the covenant. This check is documented in the annual report (see Section 15.0).

Note that the erosion control plan required by institutional control 3 has been approved by CDPHE, as required and is included as Attachment E8. CDPHE may also approve specific activities that are otherwise prohibited by the institutional controls. The approval is documented by use of a Contact Record, as described in Section 15.0.

3.2 Physical Controls

Physical controls required by RFLMA include those controls necessary to protect engineered elements of the remedy, such as landfill covers, groundwater treatment systems, and monitoring equipment.

Section 3.2 of Attachment 2 to RFLMA provides requirements for signs around the perimeter and at access points to the COU. These signs must be inspected quarterly to ensure they remain legible and meet the requirements of RFLMA. The inspections are documented in the quarterly reports.

As a BMP, the following additional controls will be implemented:

- Monitoring wells will be locked.
- Treatment system hatches will be locked.
- Monitoring stations will be locked or fenced as necessary if vandalism, intrusion, or tampering appear to be a problem.
- The East Shed will be locked.
- After the Rocky Flats Wildlife Refuge opens to visitors, gates to the COU will remain locked unless attended by authorized personnel. Until that time, it is sufficient to maintain the West Access Gate in locked (or properly attended) condition.

3.3 Requirements for Site Access

3.3.1 Training

Section 10.1 provides information on training requirements for Site access.

3.3.2 Protective Equipment

Many of the former hazards at the Site are no longer present; however, some hazards remain. Minimum protective equipment for casual Site access consists of sturdy work boots or shoes and clothing appropriate to the conditions and specific work activity. Additional equipment, such as eye protection, sunscreen, additional layers of clothing, and gloves, is recommended based on the weather and type of activity. For some types of work (e.g., construction projects), hard hats, safety vests, safety toed boots, and safety glasses may be required by the Job Safety Analysis (JSA). Refer to the *Health and Safety Manual* (LMS/POL/S04321), Standard 7.6.

3.3.3 Keys and Badges

Gates to the Site are to remain locked unless attended by Site (including authorized subcontractor) personnel. Gate keys are checked out to individuals requiring access to the Site. The administrative assistant keeps a log that includes the name of the individual, date the key is checked out, and date the key is returned. Personnel entering the Site are not required to wear a badge.

The Rocky Flats Site office is located off Site in a commercial office building. Doors to the off-Site DOE-LM office must remain locked at all times unless attended by office personnel. Keys are numbered and are checked out to individuals. The administrative assistant keeps a log that includes the key number, name of the individual, date the key is checked out, and date the key is returned. Permanent LM and LMS personnel will be issued a DOE badge. Visitors and subcontractors are issued a Rocky Flats Site-specific badge when visiting the office building. These temporary badges are numbered and are checked out to individuals. The administrative assistant keeps a log that includes the badge number, name of the individual, date the badge is issued, date the badge is returned, and signature of the sponsor. The badge should be worn in a clearly visible location. Badges are to be returned to the administrative assistant when the individual no longer requires the badge. Visitors wearing badges from other governmental agencies may use the badge issued by their organization. Visitors must sign in at the front desk and remain with their host at all times, unless the “Rocky Flats Site Unescorted Office Access Read and Sign Agreement” has been completed. The administrative assistant will maintain a visitor sign-in log.

The administrative assistant and LMS Site manager will review the badge and key logs quarterly to determine whether any badges and keys that are checked out are no longer needed by the individual. The administrative assistant will contact the individual if necessary to arrange for the return of the badge and/or key.

3.3.4 Accountability

All personnel and subcontractors performing work for Rocky Flats, both at the Site and the off-Site DOE-LM office, must be accounted for when present at the Site or the office. This section outlines accountability requirements for the office and the Site.

All office personnel are required to sign in and out using the accountability board near the administrative assistant’s office. The accountability board will serve as a roster, in addition to form LMS 2122e, Site Accountability Checklist, in the event of an office emergency (see Section 11.3). Visitors will be added to the accountability board upon arrival.

Maintenance and monitoring requirements for the Site specify or require frequent field visits to the Site. Personnel and subcontractors performing work at the Site must be accounted for. This measure, which is required for health and safety (H&S) purposes, helps reduce the potential for workers being stranded at the Site. The fundamental concepts of the accountability process are maintaining adequate communication and using common sense. Subcontractors must follow the Site accountability procedure and use the designated Site accountability point of contact for notification.

The minimum requirements for every worker at the Site are to notify a responsible individual upon departing for and returning from the Site, describe the general scope of work to be performed, and provide an estimated time of return. Notification requirements are described in greater detail below.

- The responsible individual may be the administrative assistant, H&S specialist, or an employee designated by the H&S specialist. The responsible individual must be off Site for the duration of the worker's visit that day; no one at the Site may act as the responsible individual.
- During weekends (Friday through Sunday) and other non-business hours, the H&S specialist (or designee) will be notified by the worker before any Site visit. The worker must also notify the H&S specialist upon leaving the Site at the end of the off-hours work period. Should the H&S specialist be unavailable for off-hours notification, responsibility will be transferred to another responsible individual, and all workers will be notified of the temporary change in advance.
- The same responsible individual who was notified of a worker's departure will be notified of the worker's return. Exceptions may be needed from time to time; if so, changes to the responsible individual will be discussed collectively among the worker and the former and new responsible individuals to ensure there are no safety issues or stranded workers at the Site.
- The worker will provide the responsible individual with an estimated duration and general description of expected work scope for each Site visit. If changes occur, the worker will communicate the nature of these changes (particularly if they include additional risks or extend the length of the Site visit) to the responsible individual.

During the Site visit, the following requirements will be met:

- The responsible individual must be available for direct communication via cell phone for the entire duration of the Site visit. If the responsible individual will be temporarily unavailable, a change to a different responsible individual is necessary and must be discussed among all affected parties as described above.
- All workers will be furnished with cell phones during visits to the Site or, in some instances (e.g., temporary employees), will be accompanied full time by a worker so equipped (thereby utilizing the "buddy system").
- All workers must keep their cell phones on their person and turned on throughout their stay at the Site.
- All workers are responsible for keeping their cell phones fully charged.
- If conditions warrant (e.g., extreme weather), all workers are instructed to maintain more frequent communication based on professional judgment or direction from H&S or the Site manager. The buddy system may be required, as necessary.

If the responsible individual has not received notice of the worker's return or a revised estimate of return within 30 minutes following the time estimated by the worker upon departure, the responsible individual will attempt to contact the worker. If unable to make contact within 1 hour following the estimated time of return, the responsible individual will treat this as a possible H&S issue and will respond as described below:

- Upon being unable to contact or locate a worker understood to be at the Site, the H&S specialist (or designee) will contact all other personnel currently understood to be located at the Site for assistance in locating the worker.
- If the missing worker is a Site employee, the H&S specialist (or designee) will devise and implement a plan to locate the worker and provide assistance as necessary. If the missing worker is a subcontractor, the H&S specialist (or designee) will maintain communication with that worker's responsible individual and will provide assistance as necessary.
- The LMS Site manager will be notified immediately regarding any gap in accountability of Site employees and subcontractors and will be kept informed of progress toward resolving the issue.

All subcontractors must ensure that accountability requirements are appropriately maintained as follows:

- All subcontract workers must be instructed in these accountability requirements.
- The subcontractor will be provided with a Site contact.
- The subcontractor will provide their Site contact with the appropriate contact number(s) for their designated responsible individual(s).

3.4 Requirements for Office Access

The Rocky Flats Site office is located off Site in a commercial office building. Details regarding keys and badges are described in Section 3.3.3.

Visitors to the Rocky Flats Site office will use the doorbell located at Suite 1000 to access the building. Alternatively, records and other deliveries may use the doorbell at the back door (Suite 900). Visitors (other than delivery/vendor personnel) are required to complete the "Rocky Flats Site Unescorted Office Access Read and Sign Agreement" to remain in the office unescorted or sign in at the front desk and be escorted throughout the duration of their visit by a Site employee.

Permanently assigned individuals or temporary personnel assigned to the office for more than 2 weeks will receive a building indoctrination by the H&S specialist that provides building-specific hazardous communication (HAZCOM) information. The building indoctrination will be refreshed for all assigned personnel in accordance with Section 10.1.

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